

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA
Plaintiff,

v.

Case No. 22-CR-1002 DHU

JEREMY HUNT
Defendant.

OBJECTIONS / CORRECTIONS TO PSR: SUPPLEMENT #1

Jeremy Hunt by his attorney, Douglas E. Couleur, files the following supplemental objection to the PSR.

15. ¶35

This paragraph applies one point for a Massachusetts conviction in 2016 for operating a vehicle under the influence. On August 1, 2023, and August 2, 2023, counsel received documentation from the prosecutor in the case and the court clerk showing that Mr. Hunt withdrew his plea to the charge on March 24, 2016. There were no further proceedings in the case until August 1, 2023, when the prosecutor filed a Nole Prosequi in the matter. There is no longer a warrant in this case.

Therefore, the one criminal history point should be deleted, and the case moved from “Adult Criminal Convictions” to “Other Arrests” in the PSR, which should reflect that the case was dismissed.

The documentation has been provided to the United States Probation Office and the Government on today’s date.

Respectfully submitted,

/s/ Douglas E. Couleur

Douglas E. Couleur

P.O. Box 6138

Santa Fe, NM 87502

(505) 984-1962

(505) 819-0522 (fax)

doug@couleurlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2023, I filed the foregoing pleading electronically through the CM/ECF system, which caused counsel of record for the United States and the Probation Office, to be served with a copy of this pleading by electronic means.

Electronically filed /s/ Douglas E. Couleur